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TELEFACSIMILE

April 8, 1999

TO: Blaine Foss

FROM: John H. Smith, Ph.D.
Fibers and Organics Branch (7404)
(202) 260-3964 (DESK), (202) 260-1724 (FAX)
E-Mail: smith.johnh@epa.gov

A handwritten signature in black ink, appearing to read "John H. Smith", is written over the typed name and contact information.

MESSAGE: If none of the PCB concentrations of the dielectric fluid in these transformers is the result of dilution to avoid disposal requirements, then under the PCB regulations at 40 CFR 761 subpart D, transformers containing less than 50 parts per million PCBs are not regulated for disposal.

It may be that landfills may not accept liquid- filled transformers for disposal. Drained liquids are not regulated for use, but burning these liquids for energy recovery would have to be done at a facility operating in accordance with 40 CFR 761.20(e). Please see attached incoming fax.

Office of Prevention, Pesticides and Toxic Substances
Office of Pollution Prevention and Toxics
National Program Chemicals Division
Fibers and Organics Branch

2 Pages (including cover)

FAX

3 February 1998

To: John Smith (USEPA) (202) 260-1724

From: Blaine Foss (National Park Service - Mount Rushmore Memorial) Box 268, Hwy 244 West, Keystone, SD 57730 (605) 574-3117 (2307 fax)

Subject: Electrical Equipment Disposal (less than 50 ppm PCB and out of service)

Following is a list of oil-cooled transformers and two oil-cooled power distribution switches that have been tested and certified less than the MCL. Two (other) transformers that were tested and certified in exceedance of MCL's have already been disposed of in accordance with CFR's.

- 50 KVA xfmr - less than 2 ppm (Aroclor 1260)
- 15 KVA xfmr - 14 ppm (Aroclor 1260)
- 50 KVA xfmr - less than 2 ppm (Aroclor 1260)
- 37.5 KVA xfmr - less than 2 ppm (Aroclor 1260)
- 35 KVA xfmr - less than 2 ppm (Aroclor 1260)
- 37.5 KVA xfmr - 46 ppm (Aroclor 1254 - 26ppm + Aroclor 1260 - 20 ppm)
- 50 KVA xfmr - less than 2 ppm (Aroclor 1260)
- 37.5 KVA xfmr - 3 ppm (Aroclor 1260)
- 15 KVA xfmr - 6 ppm (Aroclor 1260)
- Switch - less than 2 ppm (Aroclor 1260)
- 10 KVA xfmr - 6 ppm (Aroclor 1260)
- 5 KVA xfmr - less than 2 ppm (Aroclor 1260)
- 5 KVA xfmr - less than 2 ppm (Aroclor 1260)
- Switch - less than 2 ppm (Aroclor 1260)
- 5 KVA xfmr - less than 2 ppm (Aroclor 1260)

Our question involves proper and economical disposal of all these remaining devices. If it is allowed within the Law to dispose of some (all) of these devices in a landfill, then we would elect that option. If remediation of some of these devices at some level of performance is required by Law, then we would comply in whatever manner required. Please advise. My cell phone number is (605) 391-8560 if you require other information and cannot reach me at my desk phone. Thank you.

I'm saying this again - please advise you've received it.

Thanks, Blaine - 4/8/99